

# Appropriate Contents for Type A Evaluation Documents

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January 2002

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# What Does 49CFR Require?

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## 173.415(a) Authorized Type A Packages

- # (a) DOT Spec 7A (178.350) Type A general packaging. Each offeror of a Spec 7A package must maintain on file for at least one year ..., and shall provide to DOT... complete documentation of tests and an evaluation or comparative data showing ... construction methods, package design, and materials of construction comply with that specification (178.350)

# What Does The Next 20 Minutes Hold In Store??

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## The Abstract?

### < Contents (Appropriate)

- Purpose of “document”
- What is required per the regulations?
- What level of detail is required?
- Is it a “living document?” - up-dating required

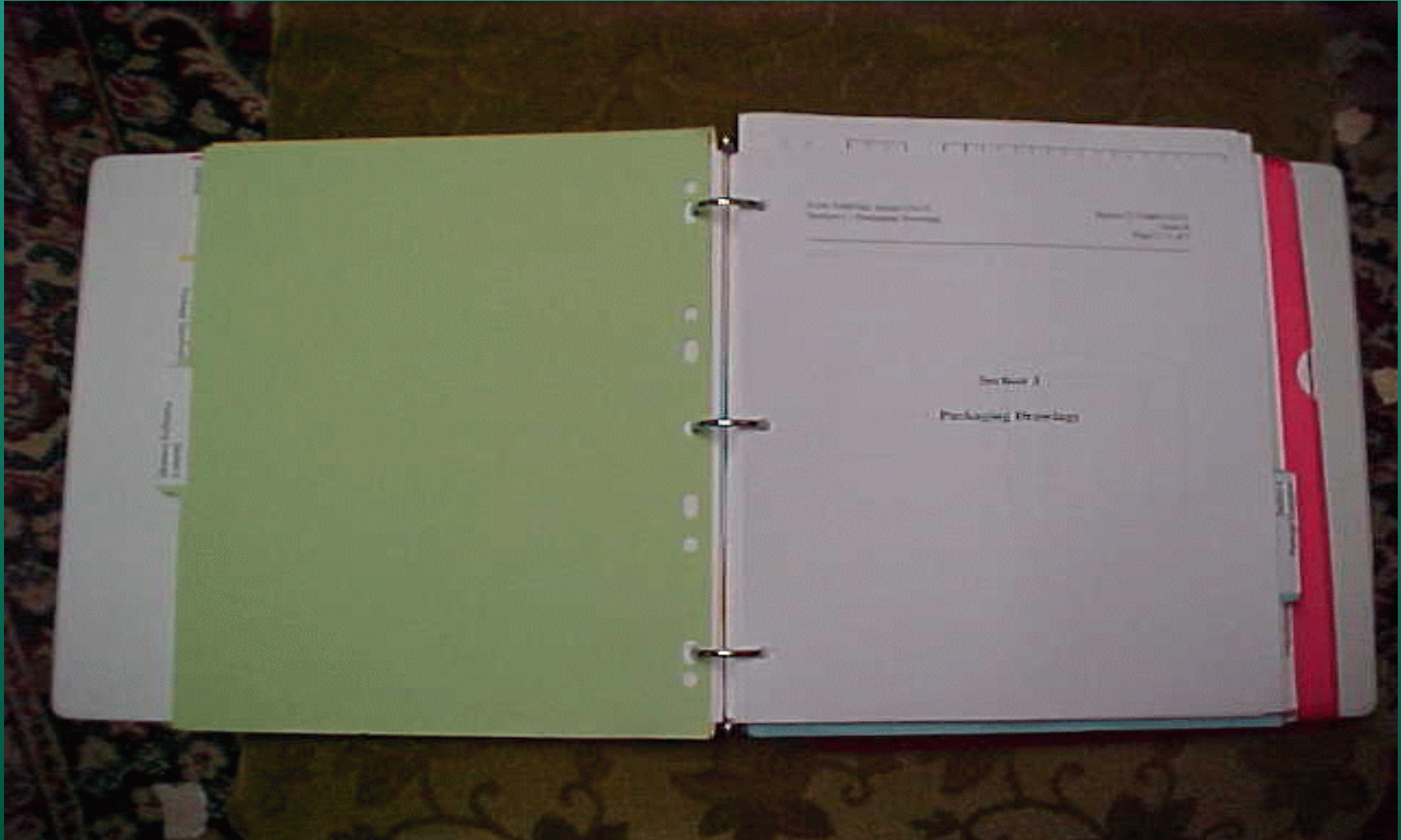
### < Title (What should we call it?)

### < Who should have it - keep it?

### < Where should it be located?

# A Few Do Exist!!

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# What Do I See When I Go To 178.350 Specification 7A; General Packaging, Type A?

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- # ... must meet all applicable requirements of Subpart B of 173
- # ...designed and constructed so that it meets 173.403, 173.410, 173.412, 173.465, 173.466, etc.

# Appropriate Contents for a Type A Evaluation Document

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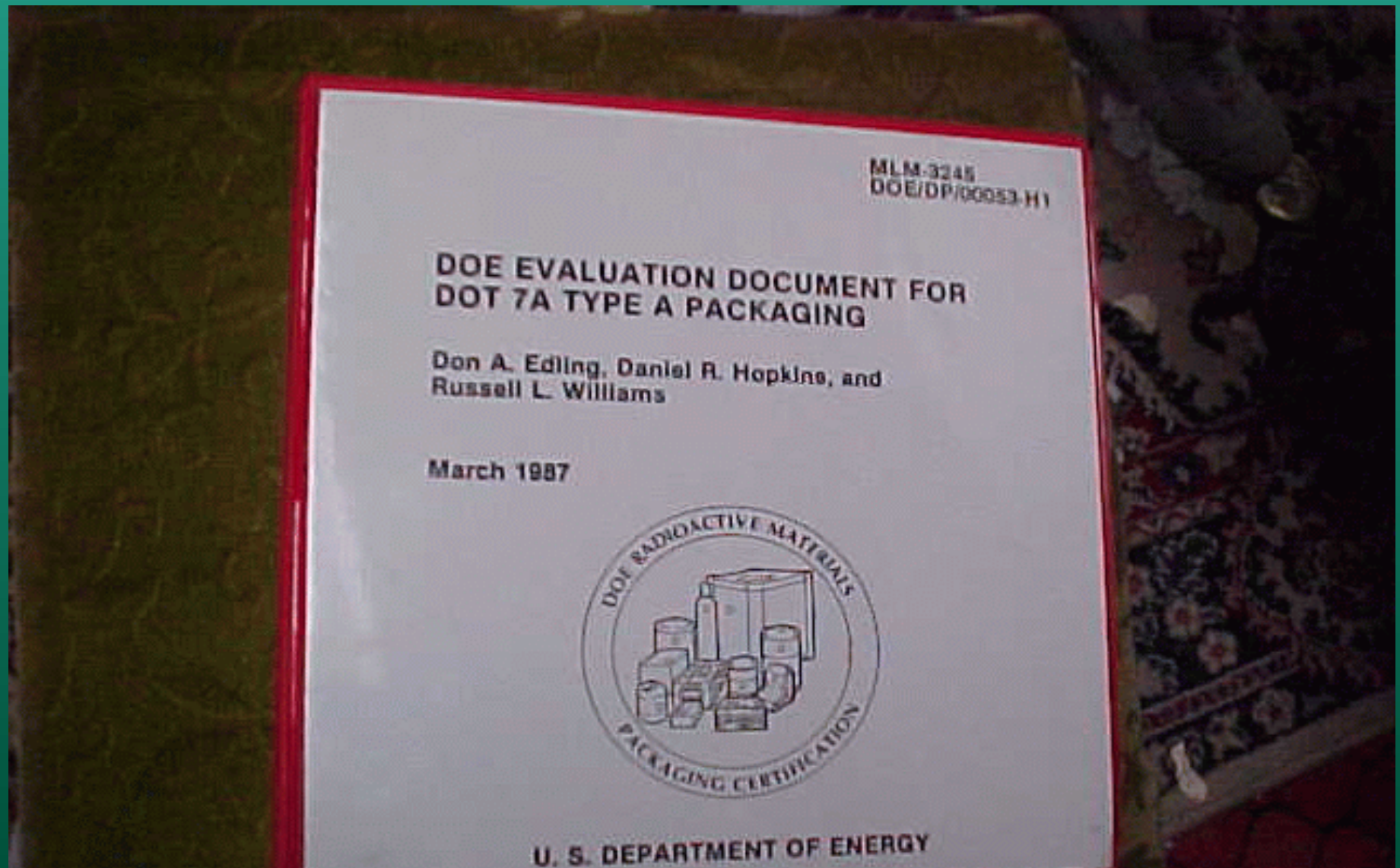
# Evaluation Document???

# Did We Miss Something When We Looked at 173.415(a) and 178.350?

# Where Are The Words “Evaluation Document?”



# From Whence Did the Term “Evaluation Document” Come?





# Some Terms or Phrases Commonly Used

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The terms/requirements below appear in the DOE Type A documents, but the regulatory compliance intent and direction has been reviewed and approved by the DOT

# ...its a “Stand Alone” document

# ...content evaluation by shipper (offeror) is required

# ...radiation level analysis is required

# The Best “Title” Depends On the Intended Use

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- # To be USED by the shipper/offeror?
- # To be USED by the packaging engineering group?
- # To be USED by Purchasing?
- # To be USED by QA..... or?
- # To sit on a shelf until a regulatory compliance person asks to see it??

# We at CROFT Inc. Feel It Is Intended to be a Regulatory Compliance Tool

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As such (a USER Document) it should include:

- # Test/evaluation/analysis data
- # Drawings (engineering drawings/specifications)
- # Assembly, loading & unloading instructions/procedures
- # Inspection Plan (& past results)
- # Maintenance Plan (& past results)

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# DOT's Implied Intent - 173.415(a)

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## Offeror will review :

- # Test data, analysis, materials of construction, method of construction
- # Compliance with 173.24 (a) & (b), 173.410, 173.412

# AND VERIFY (Offeror) DOT Spec 7A Compliance Via His or Her Signature on the Shipping Papers

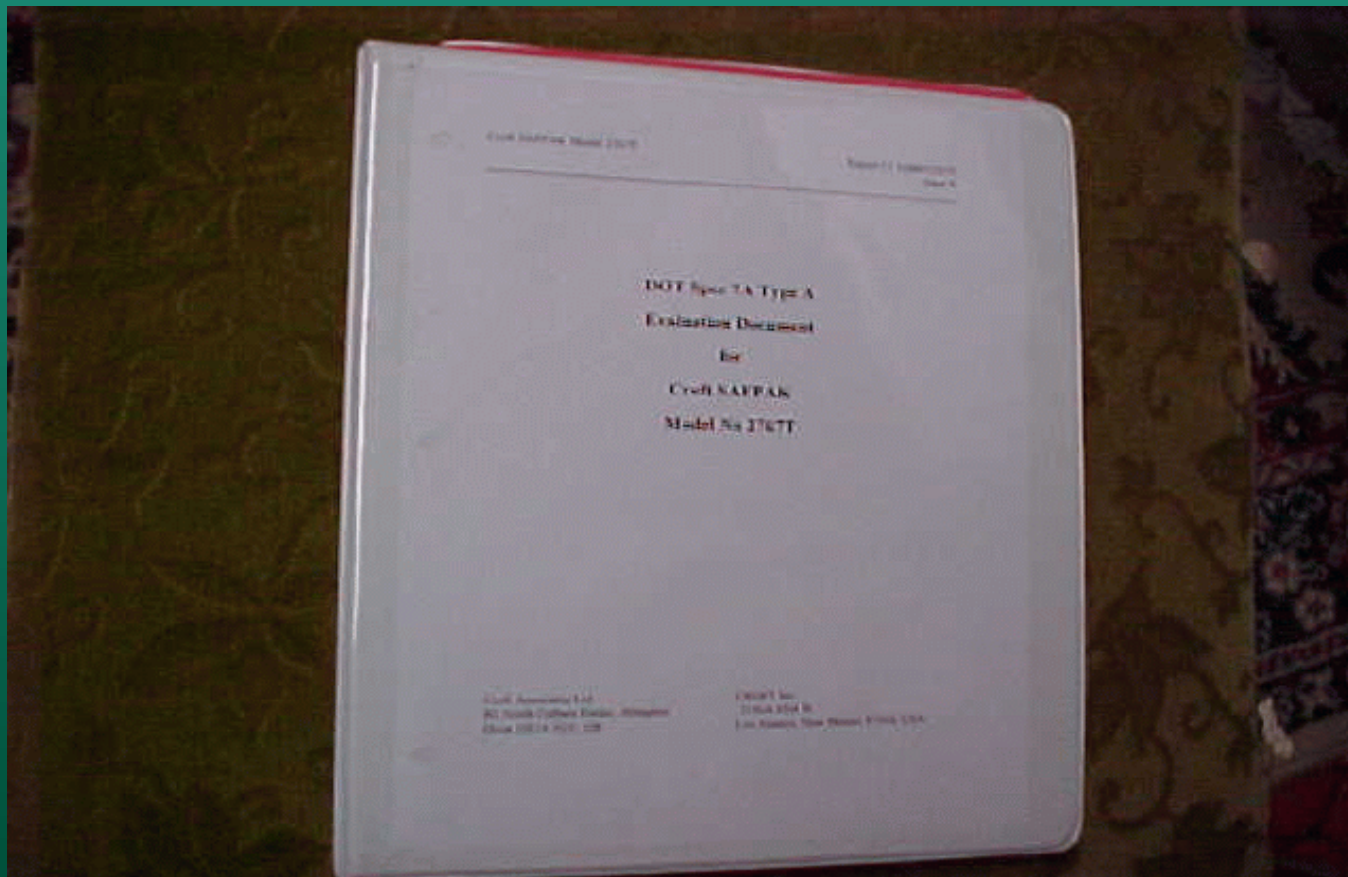
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There are several reason to take this responsibility seriously:

- # It's your name on the line
- # It is your professional reputation on the line
- # It may be your job on the line
- # It definitely is your legal liability/regulatory compliance on the line

# Where In The World Might (the start of) Such A Comprehensive Documentation Package Exist??

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# Several Questions Have Never Been Answered ( in the regulations)

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- # How much information is required in this as yet un-named entity?
- # What is the purpose of this un-named entity?
- # Where should it be located?
- # Is it a “Living” entity (needing up-dating)?

And

# What's In A Name??

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The purpose of this as yet un-named entity is:

Compliance - “Ok”

Certification - “OK”

Documentation - “OK”

# Let's Choose A Name!!!

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- # Spec 7A Evaluation Document      7A-ED
- # Spec 7A Compliance Document      7A-CD
- # Spec 7A Assessment Document      7A-AD

But, is it a “Document” as such??

- # Typically “NO”

# **This As Yet Un-named Entity Will Surely be a Compilation of Several Documents/Collections of Data and Information**

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So maybe we want to call it:

- # Spec 7A Safety Evaluation Documentation Package (7A-SED), or
- # Spec 7A Certification & Compliance Documentaton Package (7A-CCD), or
- # Spec 7A Compliance Documentation Package (7A-CD), or ...

# Appropriate Contents for a 7A-SED?

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- # Test data (evaluation/analysis), drawings/specifications, assembly - loading -un-loading instructions, inspection criteria and results, maintenance instructions and results
- # Where?
- # Routine up-dating?

# WHY??

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- # Emphasize the value of the 7A-SED contents with respect to promoting regulatory compliance
- # Emphasize need to analyze new contents
- # Emphasize need to assure replacement packagings or component parts comply in all respects to packagings specifications of packaging tested originally
- # Emphasize the need for complete assessment and documentation, not just a look at the 4 major tests -drop, penetration, water spray, compression
- # Emphasize use of 7A-SED as a training tool for new users - promote Consistency & Compliance